

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>IN RE:</b>	<b>Arturo Cantu Isabel Cantu DEBTOR(S)</b>	<b>§ § §</b>	<b>CASE NO.: 08-30430-H4-13</b>
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**OBJECTION TO HSBC Nevada, N.A. eCAST Settlement Corporation's  
PROOF OF CLAIM #24**

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Now comes, Wai Ping Cheung, Attorney for debtors in the above-captioned cause would show the Court as follows:

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE AND SERVE YOUR RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**NOTICE OF HEARING**

**This Motion is set for hearing on May 19, 2008 at 10:00am at Courtroom 600, 515 Rusk Ave., Houston, Texas 77002.**

**TO THE HONORABLE JUDGE OF THE SAID COURT:**

1. HSBC Nevada, N.A. eCAST Settlement Corporation filed a proof of claim on 5/5/08 which is claim number 24 of the Court's Claims Register.

2. The details of the Claim are follows:

- a. Secured claim: \$713.30 for an E-machine computer, monitor, Cannon printer, associated software and cables purchased on 2/12/2006.

3. The debtors object to the proof of claim because the documentation attached to the proof of claim is insufficient to support the alleged claim. There is no documentation evidence the replacement value of the collaterals.

4. The Debtors purchased the collateral – an E-machine computer, monitor, printer combo and associated software and cable purchased on 2/12/2006.

5. The debt was incurred more than one year preceding the petition date, which is 1/31/2008.

6. The debtor believes that the replacement value of the collaterals are \$200.00.

7. The Debtors' Statement is attached hereto as *Exhibit "A"*.

### **PRAYER**

8. The Debtors pray that Court:

- a. deny HSBC Nevada, N.A. eCAST Settlement Corporation's proof of claim which is number 24 of the claim registry
- b. order that the allowed claim/replacement value of the collateral, an E-machine computer, monitor, printer combo and associated software and cable purchased on 2/12/2006 is \$200.00 at 0% simple annual interest.
- c. Order HSBC Nevada, N.A. eCAST Settlement Corporation to pay the Debtors' attorney fee for having to bring this objection; and
- d. Grant the Debtors such other and further relief to which she may be justly entitled to at law or in equity.

Respectfully Submitted,

/s/

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